

**Commonwealth of Kentucky
Division for Air Quality**

PERMIT APPLICATION SUMMARY FORM

Completed by: Ralph Gosney, P.E.

GENERAL INFORMATION:

Name:	Hawley Products, Inc.
Address:	1567 N. 8 th Street Paducah, Kentucky
Date application received:	February 27, 2004
SIC/Source description:	3651/Paper speaker cone manufacturing source
Source I. D. No.:	21-145-00081
Source AI No.:	3045
Activity No.:	APE20040002
Permit number:	V-05-073

APPLICATION TYPE/PERMIT ACTIVITY:

<input type="checkbox"/> Initial issuance	<input type="checkbox"/> General permit
<input type="checkbox"/> Permit modification	<input type="checkbox"/> Conditional major
__Administrative	<input checked="" type="checkbox"/> Title V
__Minor	<input type="checkbox"/> Synthetic minor
__Significant	<input checked="" type="checkbox"/> Operating
<input checked="" type="checkbox"/> Permit renewal	<input type="checkbox"/> Construction/operating

COMPLIANCE SUMMARY:

<input type="checkbox"/> Source is out of compliance	<input type="checkbox"/> Compliance schedule included
<input checked="" type="checkbox"/> Compliance certification signed	

APPLICABLE REQUIREMENTS LIST:

<input type="checkbox"/> NSR	<input type="checkbox"/> NSPS	<input checked="" type="checkbox"/> SIP
<input type="checkbox"/> PSD	<input type="checkbox"/> NESHAPS	<input type="checkbox"/> Other
<input type="checkbox"/> Netted out of PSD/NSR	<input type="checkbox"/> Not major modification per 401 KAR 51:017, 1(23)(b) or 51:052,1(14)(b)	

MISCELLANEOUS:

- ☐ Acid rain source
- ☐ Source subject to 112(r)
- ☐ Source applied for federally enforceable emissions cap
- ☐ Source provided terms for alternative operating scenarios
- ☐ Source subject to a MACT standard
- ☐ Source requested case-by-case 112(g) or (j) determination
- ☐ Application proposes new control technology
- ☒ Certified by responsible official
- ☐ Diagrams or drawings included
- ☐ Confidential business information (CBI) submitted in application
- ☐ Pollution Prevention Measures
- ☐ Area is non-attainment (list pollutants)

EMISSIONS SUMMARY⁽¹⁾:

Pollutant	Potential (tpy)	Actual (tpy) ⁽²⁾
PM/PM10	12.94	0.28
SO ₂	0.01	0.002
NO _x	1.60	0.28
VOC	206.97	26.3
CO	1.35	0.24
Individual HAP > 10 TPY (CAS # 00067-56-1 – Methanol)	74.91	14.2
Individual HAP > 10 TPY (CAS # 00108-88-3 – Toluene)	46.2	4.5
Total HAPs > 25 TPY	121.18	22.8

Notes:

- (1) Please refer Appendix A of the Statement of Basis for detailed emission calculations.
(2) Actual emissions are based on Emissions Inventory System report for 2005.

SOURCE DESCRIPTION:

Hawley Products, Inc. (Hawley) produces paper speaker cones. The first step in the manufacturing process is mixing of paper slurry. Paper speaker cones are molded from the slurry and then dried. Hawley uses both electric and natural gas cone dryers. The cones are spray and dip coated to enhance the appearance and properties of the paper. The coated cones are dried by the indirect fired cone treatment oven. Cloth is treated with chemicals to make it rigid. The cloth is dried in the indirect fired cloth treatment oven. Cloth and/or a gasket is attached to the edge of the larger cone body opening. Hawley trims the cone body and cloth prior to adhering them together.

The source consists of the following permitted significant emission units:

- (a) One (1) paper cone treatment oven, identified as EP01 and constructed in 1984, with a maximum cone processing rate of 667 pieces per hour, and exhausting to one (1) stack P1;
- (b) One (1) wetlook spray booth, identified as EP02 and constructed in 1984, with a maximum capacity of 0.9 gallons coating per hour; and

- (c) One (1) cloth treatment oven, identified as EP03 and constructed in 1984, with a maximum cloth treatment rate of 400 yards per hour.

Insignificant Activities:

The source consists of the following insignificant activities, as defined in 401 KAR 52:020, Section 6:

- (a) One (1) natural gas fired boiler, constructed in 1990, with a maximum heat input rate of 1.68 million British thermal units per hour (EP 04);
- (b) One (1) natural gas fired boiler, constructed in 1984, with a maximum heat input rate of 1.512 million British thermal units per hour (EP 05);
- (c) One (1) storage tank, with a maximum capacity of 8,000 gallons, constructed in 1994 and storing acetone blend ;
- (d) One (1) storage tank, with a maximum capacity of 8,000 gallons, constructed in 1994 and storing methanol;
- (e) Four (4) direct fired natural gas cone dryers, with a combined maximum heat input rate of 0.24 million British thermal units per hour;
- (f) Three (3) direct fired natural gas cone dryers, with a combined maximum heat input rate of 0.3 million British thermal units per hour; and
- (g) One (1) electric oven.

The source removed the wetlook spray booth #2, identified as EP 06, in 2002. Therefore, this unit is not included in this permit renewal.

The potential to emit (as defined in 401 KAR 52:001, Section 1 (56)) of individual HAP and combined HAPs is greater than ten (10) tons per year and twenty-five (25) tons per year, respectively. Therefore, the source is a major source and is subject to the provisions of 401 KAR 52:020.

This permit is the renewed issuance of the source's Title V operating permit.

EMISSIONS AND OPERATING CAPS DESCRIPTIONS:

To preclude the requirements of 40 CFR 63, Subpart OOOO, the permittee has requested voluntary permit emission limits of less than 10 tons per year (tpy) of a single hazardous air pollutant (HAP) and less than 25 tpy of combined HAPs.

OPERATIONAL FLEXIBILITY:

None